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Attorneys for Defendants Jose Zavala and Julio Quintanilla

UNITED STATES DISTRICT COURT  
 CENTRAL DISTRICT OF CALIFORNIA

MARGARITO T. LOPEZ, SONIA  
 TORRES, KENI LOPEZ, ROSY LOPEZ,

Plaintiffs,

v.

CITY OF LOS ANGELES, JOSE  
 ZAVALA, JULIO QUINTANILLA,  
 AND DOES 1 THROUGH 10,  
 INCLUSIVE,

Defendants.

NO. 2:22-cv-07534 FLA MAAx

**STIPULATION DESIGNATING  
 CURRENT PROTECTIVE  
 ORDER [DKT 38] TO GOVERN  
 THE RELEASE OF  
 CONFIDENTIAL PERSONNEL  
 RECORDS FROM NON-PARTY  
 RIVERSIDE COUNTY  
 SHERIFF'S DEPARTMENT  
 PURSUANT TO SUBPOENA  
 AND COURT ORDERED  
 DENIAL OF PLAINTIFFS' EX  
 PARTE MOTION**

Pursuant to the Subpoena issued to the Riverside County Sheriff's  
 Department by Defendants Jose Zavala and Julio Quintanilla, and the Court's  
 Order of April 15, 2024, denying Plaintiff's ex parte application to quash same,  
 the Riverside County Sheriff's Department will and hereby does produce the  
 confidential personnel file of former deputy and Plaintiffs' designated expert,  
 Scott DeFoe.

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1 The file produced by non-party/third party Riverside County Sheriff's  
2 Department (RSD) by agreement and stipulation will be governed by all of the  
3 terms set forth in the currently existing Protective Order, Docket No. 38.

4 The documents being released by the RSD are marked "Confidential -  
5 Released Pursuant to Protective Order" as required by the Protective Order and  
6 consist of fifty-nine (59) pages.

7 Again, all terms set forth in this Protective Order will govern and control  
8 the release of this material.

9  
10 IT IS SO STIPULATED:

11  
12 DATED: May 1, 2024

FERGUSON, PRAET & SHERMAN  
A Professional Corporation

13  
14 By: /s/ Steven A. Sherman  
15 Steven A. Sherman,  
16 Attorneys for Riverside County Sheriff's  
17 Department

18 DATED: May 1, 2024

STONE BUSAILAH, LLP.

19  
20 By: /s/ Muna Busailah  
21 Muna Busailah  
22 Sherry H. Lawrence  
23 Attorneys for Defendants Jose Zavala and  
24 Julio Quintanilla  
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